

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

JAMIE EDELKIND

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)
)
) **CRIMINAL NO.**
) **04 – 10066 - PBS**
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)

MOTION OF JAMIE EDELKIND FOR PERMISSION TO TRAVEL

Jamie Edelkind (“Edelkind”), who was the defendant in this proceeding, has been on supervised release in this district under the standard conditions of supervised release since he was released from Bureau of Prisons custody on August 4, 2011, after serving almost seven years of imprisonment. On December 6, 2012, Edelkind’s supervising probation officer, Patrick Skehill, advised the undersigned that Edelkind has been in full compliance with the conditions of his supervised release and is up to date with all required restitution payments.

Edelkind has three minor children who reside in Norway. In March of 2012, the court allowed Edelkind’s motion to travel to Norway for a two week period to visit his children whom he had not seen for almost eight years. Edelkind traveled to Norway for that purpose and timely returned from the visit in full compliance with the conditions for the travel.

Edelkind now moves for permission to travel to Norway for a second visit with his children for the approximate ten day period commencing on or about December 24, 2012 and ending on or about January 4, 2013. As was the case in his previous trip to Norway, Edelkind does not require a visa or other permission

form Norway to enter that country. He would travel as a tourist entering Norway on his United States passport, without a visa but under a tourist visa waiver sanctioned by the Schengen Agreement.¹ He would stay for approximately two weeks and would reside with his children at Markallen 24, N-13168, Stabekk, Norway.

The Government and the Probation Office have each advised the undersigned that it takes “no position” on this motion.

JAMIE EDELKIND

By his attorney,

/s/ Michael J. Liston

Michael J. Liston BBO# 301760
25 Mt. Vernon Street
Cambridge, Massachusetts 02140
(857) 259-6040
michaeljliston@gmail.com

Dated: December 6, 2012

CERTIFICATE OF SERVICE

I, Michael J. Liston, do hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on this date December 6, 2012.

/s/ Michael J. Liston

¹ Although the United States is not a party to the Schengen Agreement, the United States has a tourist waiver agreement with Norway and thus a United States citizen with a passport may enter Norway as a tourist without a visa.